

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

Frank Staples, et al.,
Plaintiffs,

v.

Christopher Sununu, et al.,
Defendants.

Civil No. 1:24-cv-00331-LM-TSM

PLAINTIFFS' MOTION FOR EXPEDITED CONSIDERATION OF THEIR MOTION TO DENY
DEFENDANTS' EXTENSION REQUESTS

(Filed Pursuant to Local Rule 7.1(f) and Fed. R. Civ. P. 1 and 6(b)(1))

NOW COME the Plaintiffs, Frank Staples and Kathleen Bussiere, and respectfully move this Honorable Court, pursuant to Local Rule 7.1(f) and Federal Rules of Civil Procedure 1 and 6(b)(1), to expedite consideration of their Motion to Deny Defendants' Motions to Extend Time (Docs. 49 and 50).

1. Good Cause for Expedited Consideration

Plaintiffs have filed a detailed opposition to Defendants' extension motions, demonstrating:

- No showing of good cause under Rule 6(b);
- Significant prejudice to Plaintiffs resulting from ongoing delay;
- Repeated procedural inconsistency by Defendants;
- Continued refusal to participate in Rule 26(f) discovery planning.

Given that the current deadline for Defendants' response is imminent (or lapsed), and that Plaintiffs are being denied access to early-stage litigation rights, expedited consideration is necessary to avoid irreparable harm to Plaintiffs' ability to prosecute their claims.

2. Just, Speedy, and Inexpensive Determination Demands Timely Ruling

Under Fed. R. Civ. P. 1, this Court is charged with securing the "just, speedy, and inexpensive determination of every action." Delayed resolution of these extension motions:

- Freezes the litigation process;
- Risks spoliation of time-sensitive evidence;
- Encourages piecemeal motion practice and future delay.

Prompt adjudication of the extension issue will clarify deadlines and allow all parties to prepare accordingly.

3. Requested Relief

WHEREFORE, Plaintiffs respectfully request that the Court:

1. Expedite its ruling on Plaintiffs' Motion to Deny Defendants' Motions to Extend Time (Docs. 49 and 50);
2. Grant any such further relief as the Court deems necessary to protect judicial efficiency and prevent procedural prejudice.

Respectfully submitted,

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Dated: May 8th, 2025

CERTIFICATE OF SERVICE

I hereby certify that on May 8th, 2025, a true and correct copy of the foregoing Motion for Expedited Consideration of Plaintiffs' Motion to Deny Defendants' Extension Requests was filed electronically with the United States District Court for the District of New Hampshire. Notice of this filing will be sent to all counsel of record by operation of the CM/ECF system. If any counsel is not registered, service will be made via first class mail or other means permitted by Rule 5(b).

/s/ Frank Staples

/s/ Kathleen Bussiere



